

Businesses that handle hazardous materials and generate hazardous waste have a responsibility to ensure those materials and wastes are handled properly to prevent accidental spills and releases into the environment. In addition, businesses that handle hazardous materials and hazardous waste in certain quantities must submit chemical inventories to the County of San Diego Department of Environmental Health Hazardous Materials Division (HMD). Chemical inventories are important tools that are used by first responding fire agencies and emergency response agencies that may need to respond to chemical releases.

### **HAZARDOUS MATERIALS BUSINESS PLAN<sup>1</sup>**

Chapter 6.95 of the California Health and Safety Code establishes minimum statewide standards for Hazardous Materials Business Plans (HMBP). A business is required to prepare a HMBP and submit portions of it to the HMD if it handles or stores hazardous substances (hazardous materials and hazardous waste) at any time equal to or greater than:

- a. 55 gallons of a liquid
- b. 500 pounds of a solid substance
- c. 200 cubic feet of a compressed gas at standard temperature and pressure (STP)
- d. Toxic gas with a threshold limit value of 10 parts per million or less (San Diego County ordinance)

Be advised that pursuant to the San Diego County Code of Regulatory Ordinances, businesses that are subject to the chemical inventory disclosure and Business Plan requirements as noted above, that handle carcinogens and reproductive toxins in small amounts are required to submit to the HMD a list of each of these materials **handled during the previous year**. The list shall be based on the amount handled at any one time during the previous reporting year and be in reported in ranges based on volume or weight. You can use form HM-9243 for this disclosure.

On an annual basis, businesses that are subject to HMBP requirements must certify that their Hazardous Materials Business Plan is accurate and up to date. If changes have occurred, businesses must submit changes along with certification statement within 30 days. Updates must include changes to chemical inventory, emergency coordinator information and site map revisions. You can use form HM-953 for this HMBP Certification.

#### **I. Owner/Operator Identification**

This section of your HMBP provides HMD with the necessary business information, but more importantly it provides HMD with the emergency contacts and emergency phone numbers of those individuals that can be reached in the event of an accidental spill or release at you site. It is important that you keep this information current and immediately notify the HMD of any changes.

#### **II. Hazardous Materials Inventory and Site Map<sup>2</sup>**

In this section of the HMBP you are required to complete separate chemical inventory pages for any chemical for which the manufacturer is required by law to prepare a Material Safety Data Sheet (MSDS). A MSDS for a hazardous substance can be obtained

from the supplier of that substance. A hazardous substance also includes materials requiring placard warnings during transportation. It is important that your chemical inventory is accurate and up-to-date. This information is critical to first responders and emergency response teams that may have to assist you if you have an accidental release, spill, or fire at your facility.

You are also required to prepare a site map that indicates through standardized symbols where your hazardous materials and hazardous wastes are handled, stored, or processed. Your site map must also include standardized symbols that identify entrances and exits, fences, evacuation or staging areas, sewer drains, storm drains, culverts, fire hydrants, fire department sprinkler system connections, fire department standpipe outlets, Knox boxes (fire department key box), aboveground and underground tanks, electrical main shutoff, gas main shut off, water main shutoff, annunciator panels, stairwells, and elevators.

Site maps are important tools for first responders and emergency response teams that may need to assist if you have an accidental release, spill, or fire at your facility.

### **III. Emergency Response Plan**<sup>3</sup>

Your HMBP must include the following emergency response procedures for a release or threatened release of hazardous materials, scaled appropriately for the size and nature of your business, the nature of the damage potential of the hazardous materials handled, and the proximity of your business to residential areas and other populations:

- ✓ Immediate notification of
  - i. Local emergency response personnel;
  - ii. The HMD and the California Office of Emergency Services (OES);
  - iii. Persons within your facility who are necessary to respond to an incident;
- ✓ Identification of local emergency medical assistance appropriate for potential accident scenarios;
- ✓ Mitigation, prevention, or abatement of hazards to persons, property, or the environment;
- ✓ Immediate notification and evacuation of your facility; and
- ✓ Identification of areas of the facility and mechanical or other systems that require immediate inspection or isolation because of their vulnerability to earthquake related ground motion.

### **IV. Employee Training**<sup>4</sup>

Your HMBP must include a training program, which is reasonable and appropriate for the size of your business and the nature of the hazardous materials you handle. Your training program must take into consideration the responsibilities of the employees to be trained. Please see Chapter 7 for more details regarding training.

If any section of your HMBP is found to be out of compliance, you will be given 30 days to amend your HMBP and resubmit it to the HMD. It is important that you do this to avoid a possible enforcement action. Your HMBP must also be amended within 30 days for any of the following reasons:

- ✓ A 100% or greater increase in quantity of a hazardous material provided on the inventory.
- ✓ Any handling of a discloseable quantity of a previously undisclosed hazardous material.
- ✓ Any change in the storage, location or use of hazardous materials, which could affect an emergency response.
- ✓ Any change in business name, ownership or address.

### **CONTINGENCY PLAN**<sup>5</sup>

If you are a Large Quantity Generator (LQG) of hazardous waste you are required to develop a written contingency plan that spells out the actions that will be taken in the event of an emergency or accident involving hazardous wastes. The contingency plan is similar to the HMBP. The following information is required in a contingency plan that is not required in the HMBP:

- ✓ Procedures for evaluating incidents and the need for evacuation of surrounding areas.
- ✓ Procedures for inspections when your facility operation has been stopped
- ✓ Procedures for cleaning and repairing emergency equipment.
- ✓ Procedures for recording the incident in your facility's operating record.
- ✓ Description of arrangements made to familiarize fire and police, emergency response teams, and hospitals with your facility and its wastes.
- ✓ Description of arrangements made with state and local emergency response teams and contractors to provide emergency services.
- ✓ A list of all emergency and decontamination equipment located at your facility with a physical description of the equipment, a description of its location, and an outline of its capabilities.
- ✓ Emergency and alarm communication and procedures.

For most small plating shops, the HMD's Hazardous Materials Business Plan package (HM-952) if completed as instructed will meet the regulatory requirements for both the HMBP and the contingency plan. Some customization of your emergency plan/contingency plan may be necessary depending upon the complexity of your operation.

### **REFERENCES:**

1. California Health & Safety Code (H&SC) Section 25500 et.al.
2. H&SC Section 25505 and 25509
3. Title 19 California Code of Regulations (CCR) Section 2731
4. H&SC Section 25504 and Title 19 CCR Section 2732
5. Title 22 CCR Section 66265.51 to Section 66265.56